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August **23, 1999** In Triplicate

USDA/FSIS Hearing Clerk - Docket No. 98-045N
300 12th **Street** SW
Room 102 Cotton Annex
Washington, DC 20250-3700


Comments RE: Docket No. 98-045N President's Council on Food Safety

The North American Meat Processors Association (NAMP) is pleased to have this opportunity to add to its comments made during the July 15th public meeting called to help develop a national food safety strategic plan. We would like to commend the Departments and Agencies for their efforts to involve all the stakeholders in the plan's development. We felt the manner in which the breakout sessions were conducted presented one of the best opportunities many of us have ever had to directly affect the final outcome of a government initiative. We wonder, however, whether or not the end result will truly reflect the overall thinking and concerns raised during those sessions. It has unfortunately been our experience in the past that no matter how well intentioned the effort, the final result reflects either a political or pre-ordained regulatory agenda. This effort, however, is so important for the long term success of an unquestionable goal - that of protecting public health by significantly reducing the number of foodborne illnesses through science-based coordinated efforts - that we hope this will not be the case this time.

We believe that the Administration must make every effort and take every opportunity to convince the public and the Congress that a concerted integrated food safety effort is in the best interests of the public regardless of which political party benefits from its achievement. The effort must be ongoing regardless of who may be in the White House or who may control the Congress and/or its committees. A successful implementation of an overall public health policy requires a continuing effort monitored by an independent non-partisan expert council or group which includes representatives of all public interests and which has been given effective authority. To accomplish this, the present laws and regulations, which prevent coordinated efforts or place fire walls between agencies or departments, which limit their ability to attack causes of food safety failures, need to be eliminated. It may even mean the elimination of certain agencies, their consolidation, or change in authority. If the declared goal is actually meant to be achieved, then no stone should be left unturned nor sacred cow left in place that impedes its success.

In establishing the means to achieve the overall food safety goal, the interests of all stakeholders must be considered. They in turn may be faced with making compromises that benefit the public good. For universal food safety to have a chance of success, the effort needs to be a team effort. In reaching for the goal, however, care must be taken to assure that rules or regulations are not instituted that disrupt the distribution system to the detriment of consumers or which affect the reasonable ability of small businesses to compete in a free enterprise economy. To meet these challenges we will need intelligent and thoughtful leadership willing to transcend self-interest and political advantage. Hopefully we will accomplish it. NAMP stands ready to be of assistance in the effort. We look forward to being an active participant.

Sincerely,

A handwritten signature in black ink, appearing to read 'Deven L. Scott', with a stylized, cursive script.

Deven L. Scott
Executive Vice President